

**THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF OKLAHOMA**

HULL’S ENVIRONMENTAL SERVICES, INC.,	)	
	)	
Plaintiff,	)	
	)	
vs.	)	
	)	
MARINA DEL REY, LLC; UNITED STATES OF	)	Case No. 24-CV-00479-JAR
AMERICA ex rel. SECRETARY OF ARMY/U.S.	)	
ARMY CORPS. OF ENGINEERS; SMS FINANCIAL	)	
STRATEGIC INVESTMENTS V, LLC; TODDS A/C,	)	
INC.; MIDWEST DOZER d/b/a MIDWEST DOZER,	)	
LLC; THE COUNTY TREASURER OF MARSHALL	)	
COUNTY, STATE OF OKLAHOMA AND THE	)	
BOARD OF COUNTY COMMISSIONERS OF	)	
MARSHALL COUNTY, STATE OF OKLAHOMA;	)	
GARRETT JOHNSON; ARGONAUT INSURANCE	)	
COMPANY,	)	
	)	
Defendants.	)	

**UNOPPOSED MOTION TO EXTEND TIME TO ANSWER,  
OR OTHERWISE RESPOND TO CROSSCLAIM**

Pursuant to LCvR7.1(i), Defendant Marina Del Rey, LLC (“Defendant”), Moves for an order granting an unopposed extension of time to answer, move or otherwise respond to Argonaut Insurance Company’s Crossclaim under Rule 12 of the Federal Rules of Civil Procedure, and in support shows as follows:

1. Plaintiff Hull’s Environmental Services, Inc, (“Plaintiff”), initiated this litigation in an action captioned *Hull’s Environmental Services, Inc. v. Marina Del Rey, LLC, et al.*, bearing cause number CJ-2024-86, from the District Court of Marshall County, State of Oklahoma. Plaintiff brought claims against Defendant to foreclosure of certain liens and a money judgment. [Dkt. 2].

2. On December 12, 2024, Secretary of Army/U.S. Army Corps. of Engineers removed the Marshall County Action to the United States District Court for the Eastern District.

3. On December 20, 2024 Argonaut filed its Crossclaim against Defendant [Dkt. 11]. Although Argonaut did not effectuate service, Defendant agreed to accept service and provide a response on February 21, 2025.

4. Argonaut has further agreed to extend the time for Defendant to answer, move or otherwise respond to the Crossclaim until March 7, 2025.

5. This Motion is not sought for delay but made in the interests of justice and judicial economy.

6. Defendant has not previously requested any extension of time to respond to the Crossclaim in this case from this Court.

7. Argonaut has agreed to the granting of this extension.

8. This requested extension will have no impact on the scheduled trial or other deadlines, as none have been entered to date.

WHEREFORE, Defendant prays that the Court grant this Motion and enter an order extending the time for Defendant to answer, move, or otherwise respond to the Crossclaim until March 7, 2025.

Dated February 20, 2025.

**DOERNER, SAUNDERS, DANIEL &  
ANDERSON, L.L.P.**

By: /s/Emily E. Williams

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***ATTORNEYS FOR DEFENDANTS, MARINA DEL REY,  
LLC AND GARRETT JOHNSON***

### **CERTIFICATE OF SERVICE**

I hereby certify that the following parties are being served with a copy of this document on February 20, 2025, in accordance with the Federal Rules via CM/ECF.

Carrie Pfrehm

Mike Mordy

Michael J. O'Malley

Alexander J. Sisemore

Douglas Elliott

Stephen A. Melendi

/s/Emily E. Williams

Emily E. Williams